

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PATRICK JACK AND LESLIE JACK, husband  
and wife,

Plaintiffs,

v.

ASBESTOS CORPORATION LTD., et al.,

Defendants.

NO. 2:17-cv-00537 JLR

DEFENDANT DCO, LLC F/K/A DANA  
COMPANIES, LLC'S CORRECTED  
STIPULATION AND ~~[PROPOSED]~~ ORDER  
FOR EXTENSION OF TIME TO EXTEND TO  
TAKE THE DEPOSITION OF DCO, LLC  
F/K/A DANA COMPANIES, LLC'S  
CORPORATE REPRESENTATIVE

Counsel for Defendant DCo, LLC, formerly known as Dana Companies, LLC (hereinafter "DCo) and counsel for Plaintiffs Leslie Jack and David Jack, hereby stipulate to an extension of the discovery cutoff time beyond the previously requested extension of June 30, 2018 to July 31, 2018 for Plaintiff to conduct the deposition of DCo corporate representative Marcy Duncan. By agreement Plaintiffs scheduled Ms. Duncan's deposition in this matter for June 5, 2018. As explained in the prior Stipulation Ms. Duncan was injured in an accident and hospitalized a few days before June 5<sup>th</sup>. At the time, when or even if Ms. Duncan could be deposed was unknown. The parties

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COMPANIES, LLC'S CORPORATE REPRESENTATIVE - 1 of 4  
(2:17-cv-00537 JLR)  
[4835-9593-3292]

LAW OFFICES  
GORDON THOMAS HONEYWELL LLP  
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1 requested an extension of the deadline for her deposition to June 30, 2018, which the  
2 court approved. On June 28, 2018, the parties were informed that Ms. Duncan is well  
3 enough for a deposition, with July 24, 2018 offered for the deposition.  
4

5 DCo notified all defendants of this stipulation and proposed order and received no  
6 objections. All parties agree to the requested extension of July 31, 2018 and deposition  
7 date of July 24, 2018. Accordingly, DCo and Plaintiff seek Court approval for a second  
8 extension to July 31, 2018 for the deposition of Ms. Duncan.

9 Dated this 6<sup>th</sup> day of July, 2018.

10 GORDON THOMAS HONEYWELL LLP

DEAN OMAR BRANHAM, LLP

11  
12  
13 By /s/ Diane J. Kero

14 Diane J. Kero, WSBA No. 11874  
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By /s/ Benjamin H. Adams

Benjamin H. Adams (*Pro hac vice*)  
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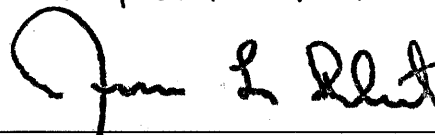
15 Attorneys for Defendant DCo LLC

Attorneys for Plaintiffs

16  
17 ORDER

18 Based on the foregoing Stipulation, it is hereby ORDERED that the discovery  
19 deadline for the deposition of DCo's corporate representative, Marcy Duncan be extended  
20 to July 31, 2018. *no extension of the dispositive motions deadline shall be granted.*

21 Dated this 9<sup>th</sup> day of July, 2018



22 HONORABLE JAMES L. ROBART

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1 Presented by:

2 GORDON THOMAS HONEYWELL LLP  
3

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5 By /s/ Diane J. Kero  
6 Diane J. Kero, WSBA No. 11874  
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8 Attorneys for Defendant DCo, LLC

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11 By /s/ Benjamin H. Adams  
12 Benjamin H. Adams (*Pro hac vice*)  
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14 Attorneys for Plaintiffs  
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CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of the filing to those attorneys of record registered on the CM/ECF system.

/s/ Karen L. Calkins

Karen L. Calkins, Legal Assistant  
GORDON THOMAS HONEYWELL LLP

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